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Attorneys for Defendants
BANK OF AMERICA, N.A. (erroneously sued as
BANK OF AMERICA) and RECONTRUST COMPANY, N.A.
(erroneously sued as RECONTRUST COMPANY)

5/28/2010

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

GURPREET KAUR,

Case No. 5:10-cv-01681-JW

Plaintiff,

VS.

BANK OF AMERICA, a business entity, form unknown; RECONTRUST COMPANY, a business entity, form unknown; and all person claiming any legal or equitable right, title, estate, lien or interest in the property described in this complaint adverse to Plaintiff's title thereto, and DOES 1 through 30, inclusive.

**STIPULATION EXTENDING TIME FOR
BANK OF AMERICA, N.A. AND
RECONTRUST COMPANY, N.A. TO
RESPOND TO PLAINTIFF'S FIRST
AMENDED COMPLAINT**

Defendants.

SF01DOCS18497

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CASE NO. 5:10-CV-01681-JW

**STIPULATION EXTENDING TIME TO RESPOND
TO FIRST AMENDED COMPLAINT**

1 Counsel for Plaintiff GURPREET KAUR (“Plaintiff”), and counsel for defendants BANK
2 OF AMERICA, N.A. and RECONTRUST COMPANY, N.A. (“Defendants”) submit this
3 stipulation and proposed order relating to the operative complaint in this case:

4 WHEREAS, Plaintiff filed a Complaint in this action in Santa Clara County Superior
5 Court on August 19, 2009;

6 WHEREAS, Plaintiff filed a First Amended Complaint in Santa Clara Superior Court on
7 March 22, 2010, alleging federal causes of action;

8 WHEREAS, Defendants removed this action to the United States District Court for the
9 Northern District of California, San Jose Division on April 20, 2010;

10 WHEREAS, Plaintiff and Defendants are actively engaged in settlement discussions,
11 including but not limited to modification to the terms of the loans at issue in this lawsuit;

12 WHEREAS, Plaintiff and Defendants agree that judicial economy and the interests of the
13 parties in avoiding unnecessary expenses would be best served and promoted by extending the
14 time required for Defendants to respond to the First Amended Complaint;

15 IT IS HEREBY STIPULATED AND AGREED by Plaintiff and Defendants that the time
16 required for Defendants to respond to Plaintiff’s First Amended Complaint shall be extended by
17 30 days, and Defendants shall file their response no later than June 28, 2010. This Stipulation will
18 not affect the schedule for the case.

19 Dated: May 26, 2010

BRYAN CAVE LLP

Robert A. Padway, Esq.
Berrie R. Goldman, Esq.

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By: /s/ Berrie R. Goldman

Berrie R. Goldman
Attorneys for Defendants
COUNTRYWIDE HOME LOANS, INC.,
COUNTRYWIDE BANK, FSB, and BANK
OF AMERICA

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Dated: May 25, 2010

LAW OFFICES OF MAHESH BAJORIA

By: /s/ Mahesh Bajoria

Mahesh Bajoria, SBN 224849
Attorney for Plaintiff
GURPREET KAUR

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